

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BENJAMIN OROZCO,
Plaintiff,

v.

CRAIG PLACKIS,
Defendant

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Civil Action No. 1:11-cv-703-LY

DEFENDANT'S JURY QUESTIONS

COMES NOW, Defendant, CRAIG PLACKIS, in the above-styled and numbered cause and file this, his Jury Questions for trial of this cause. In addition to the *voir dire* questions requested by Plaintiff, Defendant respectfully requests the Court to ask the following questions to prospective jurors:

I.

1. Would you have a hard time deciding against a Plaintiff who brought a frivolous lawsuit?
2. Would you agree that defending a frivolous lawsuit can be expensive?
3. Does anyone know the Plaintiff, Mr. Orozco, or any family member of Mr. Orozco?
4. Does anyone know any of the attorneys representing the Plaintiff or anyone who works for the Equal Justice Center and Transnational Worker Rights Clinic?
5. Would you have difficulty deciding against a Plaintiff who is represented by a non-profit law firm?
6. Does anyone know the Defendant, Mr. Plackis, or anyone who works for him or any family member of Mr. Plackis?
7. Have you ever eaten at a Craig O's location, ordered food from a Craig O's location, or know

what Craig O's is?

8. Does anyone have special knowledge of the law or is involved in any way with the practice of the law?
9. Has anyone ever been involved in a lawsuit related to wages as either an Employer or Employee?
10. Has anyone ever been in a franchise business either as a Franchisor or Franchisee?
11. Has anyone ever sued someone?
12. Has anyone ever been sued by someone?
13. Has anyone ever served on a jury?
14. If you find that the Plaintiff frivolously filed this suit to put pressure on the Defendant to pay them money, would you have a problem awarding the Defendant money for attorney's fees and costs used in defending themselves?
15. Does anyone have any questions?

Respectfully submitted,

Guillermo Ochoa-Cronfel
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By: /s/ Guillermo Ochoa-Cronfel
Guillermo Ochoa-Cronfel
State Bar No. 15175600
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify by my foregoing signature that the above and foregoing document has been served upon all parties listed below via the method indicated below and/or the Court's CM/ECF filing system on July 17, 2012.

Aaron Johnson
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TRANSNATIONAL WORKER
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VIA FIRST CLASS U.S. MAIL